



At-Large Advisory Committee (ALAC)

The Individual Internet User's Voice in ICANN

<http://www.atlarge.icann.org>

Thursday, April 15, 2010

Comments from ALAC and At-Large: Proposed Strategic Initiatives for Improved DNS Security, Stability and Resiliency

Disclaimer : This is not a 'Statement of the ALAC' and as such has not been subjected to either specific community review; Nor is it under consideration for Vote to become a formal ALAC Statement at this time. It is an aggregation of issues raised and discussed by the At-Large Community and the ALAC leading up to the Joint Letter from ALAC, ccNSO and GNSO Chairs on the issue(s) and more specifically from discussions and questions raised at the community briefing call held on April 9th a recording of this call is available see https://st.icann.org/alac/index.cgi?community_call_on_dns_cert#. Also note this Comment is in response to both the call for comments on the DNS-Cert and the DNS-SSR papers, and will be posted to both lists.

We thank ICANN for the extension from the original close of public comments advertised which has given our Community time to become better briefed on this important set of issues.

There remains however several questions and matters of concern that we believe need more attention and/or clarification:-

- The need for a new entity DNS-CERT to be created / facilitated as outlined (as opposed to a key role for ICANN in ensuring that existing CERTS and security response organizations with DNS focus (e.g. DNS-OARC) are more harmonized and /or establish new partnering and communication methods and Operational Procedures that will still meet the needs and objectives highlighted by the gap analysis undertaken. ICANN could and should have a key role in any cooperative outcome that develops and should also be a main facilitator if such outcomes but in clear partnership with other main actors in the security stability and threat response field.
- We are not clear (both from our presentation and the responses to the questions from ccTLD operators on the call) that there has been sufficient community outreach and involvement in the development of the proposals so far; nor do we see evidence that this has been done anywhere near effectively enough at this stage. Certainly not sufficiently enough to be classed as a 'bottom-up process'.
- We also we note the shifting of definition of 'community' in terms of consultation and input into the processes undertaken so far; From that which is traditionally used in ICANN to mean 'our' stakeholders, actors, interested parties (reflected by the makeup of the constituencies and sub units of our various AC & SO's) and often extended to include public input from Internet users and domain name registrants; To one that is limited to a 'community' of security and threat response interested parties. This is of significant concern to ALAC and At-Large, as is the fact that after availing ourselves of the excellent and well received presentation on the background to all this in our community call see reference link above that we are still uncertain exactly who these "community [security community] actors" are who was consulted and who contributed to the needs analysis and business case report.

Wide DNS community and stakeholder outreach and involvement in our next steps is clearly required; And cooperation is the Key and we look forward to wider and more globally inclusive engagement of key stakeholders and the ICANN community (inclusive of our SSAC & RRSAC) of the gap and or risks as well needs analysis that will allow the desired outcomes to be best achieved.

To this end we reiterate here the previously identified next steps (see joint letter from ALAC, ccNSO and GNSO Chairs) and wish to note the desire from our community for ICANN to establish a joint SO/AC Working Group and follow our bottom-up multi-stakeholder model of collaborative work; and we echo points made in the ccNSO response to the Public Comment i.e. that "The Working Group should have the option of inviting participation from external experts and the group's recommendations and findings must be circulated to the broader Internet security community for comment. Any final proposals ICANN and its immediate community arrive at should also be widely consulted upon, and should seek the support of all existing security stakeholders. This group could be formed at the ICANN meeting in Brussels in June, if not sooner..."